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October 18, 2018

Acting Freedom of Information Act | Privacy Act Officer

Administrator, ARS, USDA, Room 302-A

Jamie L. Whitten Federal Building

14th & Independence Avenue, SW

Washington, DC 20250

"Letter of Opinion"

“ Shaw College at Detroit ” - (b)(6) Privacy, (b)(7)(C) Enf. Privacy

7351 Woodward Avenue, Detroit, MI 48207

Re: “FOIA Appeal” - Response, Freedom of Information Act (FOIA) Submitted

USDA Office of Inspector General (OIG) January 26, 2018 (b)(6) Privacy, (b)(7)(C) Enf. Privacy

Dear Sir and Madame.

As requested, I have reviewed correspondence provided my client that advises a search for responsive records was conducted by USDA’s National Institute of Food and Agriculture (NIFA), investigations were thorough and the REE FOIA office is unable to provide any responsive records. The REE FOIA request was assigned tracking number (b)(6) Privacy, (b)(7)(C) Enf. Privacy

“According to NIFA, a search was conducted of records dated 1980 to 1989 and NIFA has no documents or funding mechanism referencing Shaw College of Detroit as an HBCU”.

Accommodating, the Archivist, Ronald Reagan Presidential Library and Museum; 40 Presidential Dr., Simi Valley, CA 93065 Tel. (805) 577-4063 Fax (805) 577-4074, www.reaganlibrary.gov has confirmed the Shaw College At Detroit is in fact a Historical Black College and University (“HBCU”).

Significant, a “[U.S. Presidential Executive Order 12320](#)” was originally signed September 15, 1981 by President Ronald W. Reagan;

Importantly, the “[USDA Implementation of this Executive Order](#)” was on January 15, 1985, and the documentation referenced in the link lists Shaw College in Detroit as a HBCU.

The U.S Presidential Executive Order serves as the Authorizing Instrument for the designation of Shaw College At Detroit as a HBCU.

The U.S.D.A. Implementation Plan issued serves to confirm *entitlement of Shaw College At Detroit to actively participate in the USDA's Research, Education, and Economics (REE) initiatives* designed to strengthen HBCU's, and importantly, approval of Shaw College At Detroit to participate in the HEA 1965, Amended; Federal Financial Aid Initiative; Title IV. Thereby, substantiating the "funding mechanisms"

Current Senior Institutional Review Specialist, U.S. Department of Education validates a recent review of significant internal data and files maintained for the U.S.D.E Federal Financial Aid confirms the *Shaw College at Detroit was not closed.*

The Authorizing Body, U.S Department of Education, confirms in order to have authorized the active participation in the Federal Financial Aid Program, Shaw College At Detroit would have had to be in compliance with all regulatory entitlements. Therefore, Institutional Review Specialists, U.S.D.E have confirmed unequivocally, Shaw College at Detroit was an accredited educational institution, and IRS Tax Exempted.

Pursuant to the Court Order, U.S. Federal District Court MI; 1.9.1985, all parties present; Counsels of the U.S.D.E, Michigan Department Education, Meharry Allied Health Learning Center, Inc., and Court Appointed Trustee, Shaw College at Detroit.

The Court determined Meharry Allied Health Learning Center, Inc. held provisional institutional accreditation issued by the American Bureau Health Education Schools, (ABHES), and was licensed as an education institution by the state, Michigan Department of Education, and was IRS Tax Exempted.

Importantly, the Court determined Shaw College at Detroit and the Meharry Allied Health Learning Center, Inc.(University St. Augustine's & Institutes of Medicine) meets the standards in 34 CFR Part 668, and the Court Ordered Shaw College At Detroit's eligibility to participate in Federal Financial Aid *preserved.*

Significant, the Court Ordered the assignment of assets for Shaw College At Detroit comprising the University Education Charter including its designation, Authority, and funding entitlements as a HBCU to be assigned to Meharry Allied Health Learning, Inc. (Meharry College, LLC) as the Successor, and new owner "Shaw College at Detroit".

Further, the Court barred any and all thwarts impeding the successful authorization of the U.S.D.E Federal Financial Aid Application authorized to be presented on behalf of the educational institution Successor, Meharry Allied Health Learning Center, Inc. and the name changed to Meharry College, LLC. Please note the name changed is now known as the "University St. Augustine's and Institutes of Medicine" (University St. Augustine's | USA).

The ABHES officials have confirmed that in its capacity as a National Accreditation Body, the Meharry Allied Learning Center, Inc. (Meharry College, LLC) was authorized full institutional accreditation subsequent to the Court Order issued 1.9.1985. Further, ABHES officials confirm the Institutional Accreditation issued Meharry Allied Health Learning Center, Inc. was active and in good standing as of October, 1987.

Respectfully,

Kevin M. Bannon

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Enclosures | Affirmations:

U.S. Federal District Court MI - [Court Order - The Honorable Judge Ray Reynolds Graves 1985](#)

U.S. Federal District Court MI - [Court Order - The Honorable Judge Ray Reynolds Graves 1995](#)

U.S. Federal Appeal Court - Court Order - [The Honorable Judge Julian Cook](#)

U.S. Federal Appeal Court - Court Order - [The Honorable Judge Damon Keith;1986 - Advisory](#)

Affirmations Awaiting

Affidavit - Geoffrey Fieger, Attorney | Affidavit - Judge Terrance Keith | Affidavit - Nora Hudson, Attorney

Affidavits - Governor James Blanchard;1990,and Governor John Engler, 1992;
Morrill Act 1890, Amended; Land Grant Designation; Shaw College At Detroit (USA) Endorsement Designation NAFFEO; 1994,

[MILARA Certification: Shaw College at Detroit](#)

City of Detroit Resolution;Recognition, [St. Augustine's University as a HBCU](#); 1989

[NAS | Michigan Lutheran College](#): Lutheran Church Missouri Synod Recognition Merger Consolidation, Shaw College At Detroit; 1936
"NAS" Corporation Registration AND Name Changed 1970.

[DLEG: Caroline Education Community International PSA](#) - Registration 7.2.2004; predecessor, Primary Schools Lutheran Church Synod. [MI Governor Executive Order: 11.5.2003](#)

[CIA Issuance of Final Report 6.27.2006](#): USDE Secretary Bell Prepared Annual Federal Plan HBCU; 1981 & 1982 - Shaw College At Detroit was added

[Accrediting Bureau of Health Education Schools \(ABHES\)](#) Meharry Allied Health Learning Center, Incorporated (AKA: Meharry College, LLC), Successor: Shaw College At Detroit held full institutional accreditation until its demise the MDE intentionally perpetrated to revoke proprietary school licenses.

Integrated Postsecondary Education Data System (IPEDS) (IPEDS); Validation "Shaw College At Detroit" Authorized as a Title IV, eligible Institution of Higher Education pursuant to Higher Education Act 1965; Amended.

Meharry Allied Health Learning Center, Inc. | [St. Augustine's University Foundation](#) | St. Augustine's National Foundation.

Meharry Allied Health Learning Center, Inc. | [Caroline Education Community International PSA](#) - Proprietary Schools

Complimentary Copies:

C/o: Christian Haines, JD | Legislative Director and Counsel

House Committee on Education and Workforce | Ranking Member, Congressman Bobby Scott

C/o:John Christi, Legislative Director

House Committee on Education and Workforce | Congresswoman Alma S. Adams

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